

## REMARKS/ARGUMENTS

In the Office Action mailed July 29, 2008, claims 1-14 are rejected. Additionally, the specification is objected to and claims 1 and 6 are objected to. Applicants hereby respectfully request reconsideration of the application in view of the below-provided remarks. No claims have been amended, added, or canceled.

### Objection to the Specification

The specification is objected to because “the specification does not teach that during a high voltage operation, there is a substantially zero voltage drop across said relatively lower breakdown voltage driver.” (Office Action, page 2, item 2) Applicants respectfully submit that the specification at page 3, lines 20-22 discloses that “during a high voltage operation, said high voltage breakdown driver is connected to said output and there is a substantially zero voltage drop across said relatively lower breakdown voltage driver.” Because the specification discloses the subject matter identified in the Office Action, Applicants respectfully request that the objection to the specification be withdrawn.

### Objection to the Claims

Claims 1 and 6 are objected to because “the claims recite that during a high voltage operation, there is a substantially zero voltage drop across said relatively lower breakdown voltage driver, but the specification fails to teach this limitation.” (Office Action, page 2, item 3) Applicants respectfully submit that the above-identified limitations of claims 1 and 6 are disclosed in the specification at, for example, page 3 lines 20-22. Because the specification discloses the above-identified limitations, Applicants respectfully request that the objections to claims 1 and 6 be withdrawn.

### Claim Rejections under 35 U.S.C. 112

Claims 1-14 are rejected under 35 U.S.C. 112, first paragraph, as failing to comply with the enablement requirement. Applicants respectfully submit that the

specification teaches that during a high voltage operation, there is a substantially zero voltage drop across said relatively lower breakdown voltage driver, see page 3, lines 20-22. Hence, Applicants respectfully assert that claims 1-14 comply with the enablement requirement.

#### Claim Rejections under 35 U.S.C. 102 and 103

Claims 1-5 are rejected under 35 U.S.C. 102(b) as being anticipated by Mentze et al. (U.S. Pat. No. 7,030,654, hereinafter Mentze). Claims 6, 7, and 11 are rejected under 35 U.S.C. 103(a) as being unpatentable over Mentze in view of Parkinson et al. (U.S. Pat. No. 5,889,415, hereinafter Parkinson). Claims 8-10 are rejected under 35 U.S.C. 103(a) as being unpatentable over Mentze in view of Parkinson and further in view of Chen et al. (U.S. Pat. No. 7,193,441, hereinafter Chen). Additionally, claims 12-14 are rejected under 35 U.S.C. 102(b) as being anticipated by Mentze in further view of Rhee et al. (U.S. Pat. Pub. No. 2001/0000949, hereinafter Rhee). However, Applicants respectfully submit that these claims are patentable over Mentze, Parkinson, Chen, and Rhee for the reasons provided below.

#### Independent Claim 1

Claim 1 recites:

“A voltage driver circuit for driving a device at a selected one of a plurality of voltages associated with respective device operations including a high voltage operation and a relatively lower voltage operation, the driver circuit comprising an input (IN), a single output (OUT) for connection to said device, and a plurality of voltage drivers between said input and said output including at least one high voltage breakdown driver and at least one relatively lower breakdown voltage driver the circuit being arranged such that, during a high voltage operation, said high voltage breakdown driver is connected to said output and there is a substantially zero voltage drop across said relatively lower breakdown voltage driver, and, during a relatively lower voltage operation, said relatively lower breakdown voltage driver provides the drive voltage for driving said device, the contribution of said high breakdown voltage driver to said drive voltage during said relatively lower voltage operation being substantially negligible.” (emphasis added).

In contrast to claim 1, Mentze does not disclose that “during a high voltage operation, said high voltage breakdown driver is connected to said output and there is a substantially zero voltage drop across said relatively lower breakdown voltage driver.”

In particular, Mentze discloses that a low voltage buffer stage (104) is utilized as an inverter, see column 3 lines 29-30. Mentze also discloses that an exemplary low voltage buffer stage (104a) includes a single inverting buffer, see column 4 lines 66-67 and column 5 lines 1-3. However, Mentze does not disclose that during a high voltage operation there is a substantially zero voltage drop across the low voltage buffer stage (104 or 104a). Because Mentze does not disclose all the limitations of claim 1, Applicants respectfully assert that claim 1 is not anticipated by Mentze.

#### Dependent Claims 2-5 and 12-14

Claims 2-5 and 12-14 are dependent on claim 1. Applicants respectfully assert that claims 2-5 and 12-14 are allowable at least based on an allowable claim 1.

#### Independent Claim 6

Claim 6 recites,

“A voltage driver circuit for driving a device at a selected one of a plurality of voltages associated with respective device operations including a high voltage operation and a relatively lower voltage operation, the driver circuit comprising an input (IN), a single output (OUT) for connection to said device, and a plurality of voltage drivers between said input and said output including at least one high voltage breakdown driver and at least one relatively lower breakdown voltage driver the high breakdown voltage driver comprising a voltage level shifter which is connected at the input of the circuit between first and second voltage lines, the output of said level shifter being connected to the input of a relatively lower breakdown voltage driver connected to the output between said first and second voltage lines, the voltage driver circuit being arranged such that, during a high voltage operation, there is a substantially zero voltage drop across said relatively lower breakdown voltage driver.” (emphasis added).

Claim 6 includes similar limitations to claim 1. Because of the similarities between claim 1 and claim 6, Applicants respectfully assert that the remarks made above with regard to claim 1 apply also to claim 6. Accordingly, Applicants respectfully assert that a *prima facie* case of obviousness has not been established with respect to claim 6.

#### Dependent Claims 7-11

Claims 7-11 are dependent on claim 6. Applicants respectfully assert that claims 7-11 are allowable at least based on an allowable claim 6.

### **CONCLUSION**

Applicants respectfully request reconsideration of the claims in view of the remarks made herein. A notice of allowance is earnestly solicited.

Respectfully submitted,

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